

Kevin S. Sinclair, Esq., Nevada Bar No. 12277  
*ksinclair@earlysullivan.com*  
Sophia S. Lau, Esq., Nevada Bar No. 13365  
*slau@earlysullivan.com*  
EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP  
8716 Spanish Ridge Avenue, Suite 105  
Las Vegas, Nevada 89148  
Telephone: (702) 331-7593  
Facsimile: (702) 331-1652

Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HSBC BANK USA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE  
INSURANCE COMPANY and LAWYERS  
TITLE INSURANCE CORPORATION,

Defendants.

Case No.: 3:19-cv-00265-MMD-WGC

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFF'S OPPOSITION TO  
MOTION FOR JUDGMENT ON THE  
PLEADINGS**

**[First Request]**

Plaintiff HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2 ("HSBC Bank"), and Defendant Fidelity National Title Insurance Company ("Fidelity") (collectively, the "Parties"), by and through their counsel of record, by and through their respective attorneys of records, hereby agree and stipulate as follows.

1. On November 26, 2019, Fidelity filed a Motion for Judgment on the Pleadings [ECF No. 20];

2. On December 10, 2019 the Court granted the parties' first stipulation to extend HSBC Bank's deadline to respond [ECF No. 22];



3. HSBC Bank filed its response in opposition to Fidelity's motion for judgment on the pleadings on January 9, 2020 [ECF No. 25];

4. Fidelity's reply to HSBC Bank's response in opposition to Fidelity's motion for judgment on the pleadings is due January 16, 2020;

5. Fidelity's counsel is requesting a two-week extension until Monday, January 30, 2020 to file its reply to Deutsche Bank's response in opposition to Fidelity's motion to dismiss to accommodate various scheduling conflicts for Fidelity's counsel and to afford Fidelity's counsel additional time to review and respond to HSBC Bank's points and authorities in opposition to the motion to dismiss;

6. Counsel for Deutsche Bank does not oppose the extension;

7. This is the first request for an extension made by counsel for Fidelity which is made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED** that Fidelity's reply to HSBC Bank's response in opposition to Fidelity's motion for judgment on the pleadings shall be due on Thursday, January 30, 2020.

DATED this 10th of January, 2020.	DATED this 10th of January, 2020.
WRIGHT, FINLAY & ZAK, LLP	EARLY SULLIVAN WRIGHT GIZER & McRAE LLP
<u>/s/--Lindsay D. Robbins</u> Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff HSBC Bank USA, N.A., As Trustee For The Registered Holders Of Nomura Home Equity Loan, Inc., Asset-Backed Certificates, Series 2006-HE2</i>	<u>/s/--Kevin S. Sinclair</u> Kevin S. Sinclair, Esq., Nevada Bar No. 12277 Sophia S. Lau, Esq., Nevada Bar No. 13365 8716 Spanish Ridge Avenue, Suite 105 Las Vegas, Nevada 89148 <i>Attorneys for Defendant, Fidelity National Title Insurance Company</i>

**IT IS SO ORDERED.**

Dated this 10th day of January, 2020.



UNITED STATES DISTRICT COURT JUDGE